

# EXHIBIT F

# **PRIVILEGED & CONFIDENTIAL**

## **ATTORNEY WORK PRODUCT**

### **AGENDA**

#### **Meeting of Lead Counsel**

#### **PSC-Actavis**

May 5, 2010

#### **Non-Settlement Issues – The June/July schedule**

1. General Issues

- This is an economic settlement;
- The agreement does not assume that every person with a claim will be compensated;
- There is no direct proof of defective Digitek® ever having left Actavis, or ever having been ingested by a Plaintiff; and
- This settlement does not contemplate punitive damages.

2. Efforts to get full participation.

3. Medical panel.

4. Special Master.

5. Class actions.

6. Funding

- Administrative expenses;
- PSC;
- Out of pocket expenses;
- Reasonable value of services;
- Compensation for claimants;
- Caps; and
- Appellate rights.

7. Factors to consider in settlement determinations.
8. Cut off dates.
9. Dismissal of Mylan.
10. Liens.
11. Documentation required.
12. Response to your initial settlement proposal outline.
  - Proof of use;
  - Proof of injury;
  - Type of Digitek® related injury;
  - Economic injury;
  - Risk factors; and
  - Dollar figures.